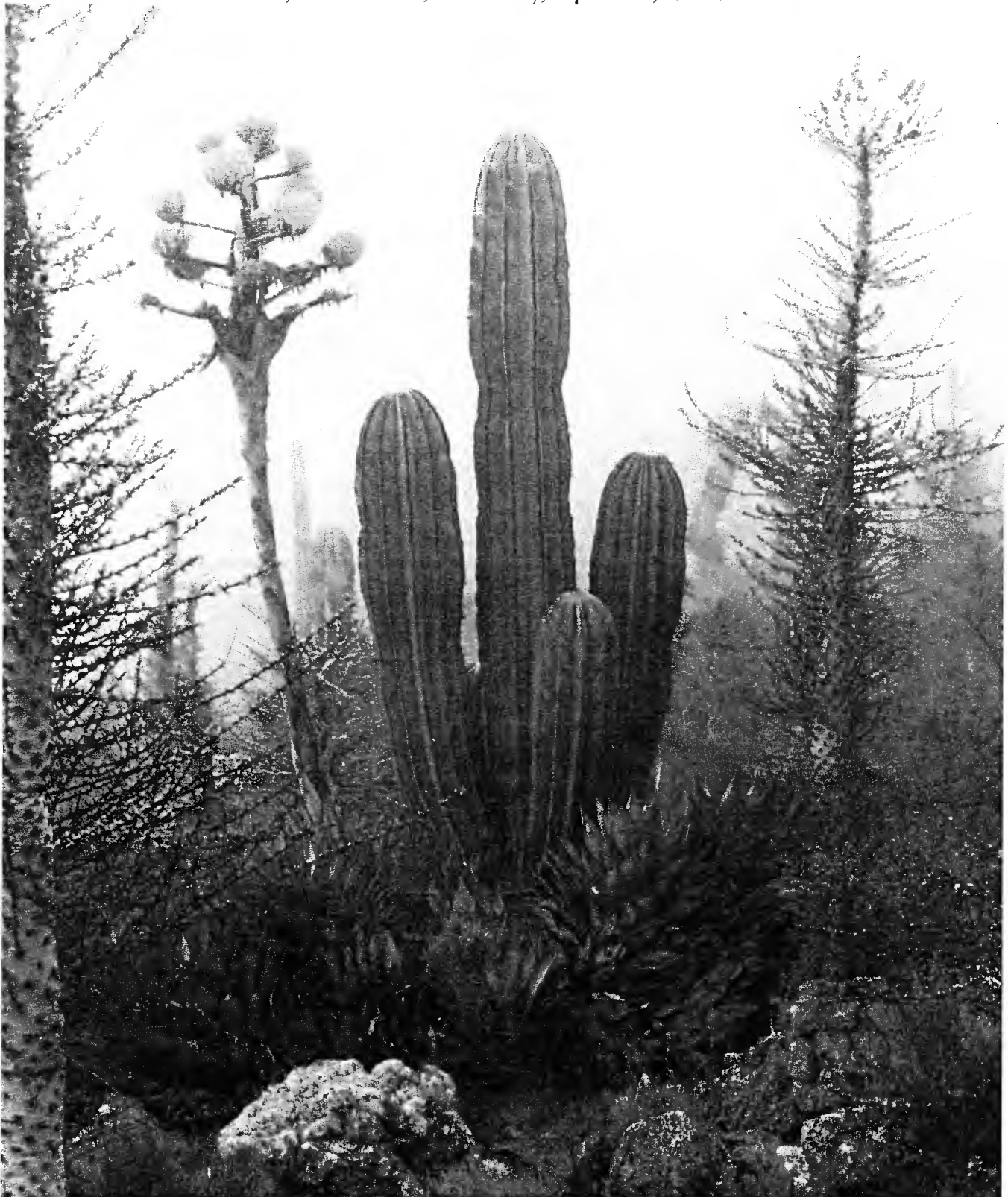


Espinas y Flores

Newsletter of the San Diego Cactus and Succulent Society, Inc.

Affiliated with the Cactus and Succulent Society of America

Volume 37, Number 4, Saturday, April 13, 2002 at 1:00 PM



IN ONE OF THE MOST BIZARRE FINDS TO COME OUT OF THE ANZA-BORREGO, THIS SCENE IS FROM A SMALL UNEXPLORED CANYON ON GRANITE MOUNTAIN IN THE ORIFLAME AREA. NO RECENT PHOTOS EXISTED UNTIL NOW!

APRIL'S PROGRAM:

Mark Muradian will present a program on the sights, sounds and smells of Soqotra. Traveling from Yemen, he visited the remote island in the Indian Ocean for two weeks in January, 2001. He was accompanied by an international group of plant enthusiasts that included Dylan Hannon and Myron Kinnach. Mark will show us a variety of fantastic species including *Dracena cinnabari*, the dragon blood tree, *Dendrosicyos soqotrana*, the cucumber tree, *Dorstenia gigas* and *Adenium soqotranum*. He will also share with us some local music and burn frankincense purchased there as well as modeling the local clothing. This will be a very interesting cultural presentation so don't miss out. Room 101, Casa del Prado, Balboa Park, 1:00 PM, April 13, 2002.

.....

OUR COVER: DON'T FORGET YOU HEARD IT HERE FIRST!

In one of the most incredible finds to come out of the Anza-Borrego Desert area, this 'Baja-like population was recently rediscovered after some great detective work. These plants were originally found in 1957, with a cryptic reference in Horace Parker's, *Anza Borrego Desert Guide Book*. "But without any verification, no one believed it until this photo was taken" said, Rick Ross and Jane Garret. They found these plants using the reference in Parker's book and delving into the archives of the Anza-Borrego Desert Natural History Association.

Rick and Jane were checking out one of these obscure references in the field when they made the find: "We were wandering up Rodriguez Canyon, and took a small hidden wash towards Granite Mountain, in the Oriflame area, when we spotted what looked like a Saguaro and these weird Ocotillos. We knew we had found the spot! We did not realize we had made such an important find though" Jane said. "Everyone knows that there are Elephant Trees further north, in the Park" Rick said. "We had a good idea that we'd find these typical Baja plants because of the Elephant Tree connection". "The plants pictured look like, an *Agave shawii* and some sort of strange Ocotillo/Boojum intermediate", a noted botanist, said. "If I was going to speculate on a Baja-like habitat it would be in the Oriflame area because of the sheltered location, though it does get quite windy there and the rock formations are a bit different than Baja California." he said. "This is an unexpected but wonderful discovery. Jane and Rick may have made the cactus and succulent find of the century! We hope to have them talk to the club about their adventures in the near future ... (please see the bottom of this page for more)

.....

Please send your letters, artwork, poetry, Cactus or Succulent of the Month articles, puzzles, comments, or criticisms, etc. to:

Tom Knapik
4669 71street
La Mesa, CA 91941
Phone 619-462-1805 e-mail eyf 2000
Call ahead for FAX 858-569-8510

NEWSLETTER SUBMISSIONS ARE DUE BEFORE THE 14TH EACH MONTH UNLESS OTHER ARRANGEMENTS ARE MADE.

Espinas y Flores, the newsletter of the San Diego Cactus and Succulent Society, Incorporated, P.O. Box 33181, San Diego, CA 92163-3181, is published monthly with the exception of a combined May-June issue (11 mailings per year). Newsletter circulation is approximately 275, with approximately 20-30 issues going to educational institutions, botanical societies, cactus and succulent nurseries, local publications, related natural history events, exhibits, and other interested groups or individuals upon request. Subscriptions are \$15 per year for bulk mail within the U.S.A.

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Cover continued, look at the publication date, yes it is April Fool's Day - Horace really was an honest fellow, no cryptic messages in his book ... but the rest of us should remember to have fun. The Photo is of the Baja Garden, at the Wild Animal Park, on a Foggy Spring weekend in 2000. Hope you enjoyed the story. But you actually can still go to visit this garden when ever you want, without leaving the US, just pay the price of admission or volunteer to help out with this world class collection.

PRESIDENT'S MESSAGE APRIL 2002

It is Spring, the desert is in bloom, and we are going on a FIELD TRIP! I am excited and look forward to spending April 14th with all of you. We will be departing at 8:00 AM SHARP from the parking lot behind the Organ Pavilion in Balboa Park — Look for the Sundance Coach. North county pick up will be at 8:30 AM, at the park and ride in Escondido - Highway 78 and Broadway. We will spend the day at The Living Desert, Wildlife and Botanical Garden, in Palm Desert. We will provide drinks and snacks for the trip - lunch is on your own. Bring a picnic, or enjoy lunch in one of their restaurants. There are still a few seats available — so call me ASAP if you have not already made your reservations! Cost is only \$20 for members, \$28 for non-members.

Our March meeting was lots of fun, featuring talks by Alan Weiss and Lee Badger – thanks to both of them for sharing their knowledge and insights. Juergen Menzel's tour of American Deserts, featuring *Pediocactus* in habitat, was fascinating and made me want to go on a road trip! The meeting also featured a contest for poster design for our June Show and sale. Congratulations to Eugene Orth for his design – he will receive \$50 in script to spend on plants! Thanks to all who participated. I also want to thank everyone for helping out with picking up and leaving the meeting room clean - just a little effort by many made a huge difference. Thanks also for all the great snacks!

With all the members ... it was a pleasure to help out at the Home and Garden Show at the Del Mar Fairgrounds, March 1,2 and 3. Thanks to Joe Kraatz, Herb Stern, Terry and Collette Parr, Lee and Pam Badger, Tom and Laura De Merritt. We all had a successful weekend talking to people and signing up some new members. The volunteers from the Wild Animal Park, lead by Chris Miller, had the booth next door and also did a good job telling people about our Society. Thanks to everyone.

Remember - our June show will be here before you know it. Our recent warm weather really has the cactus waking up and looking good. Look over your collection – repot some plants, clean up some pots and get ready for *SHOW TIME*.

I look forward to seeing you on April 13th for the monthly meeting and on the 14th for the Field Trip.

Pam Badger, pambadge@earthlink.net — Your comments and suggestions are always welcome.

B r a g T a b l e W i n n e r s

Judging by: Thomas De Merritt

C A C T I

The Cacti were absent . . . make sure you bring them in April!

O T H E R S U C C U L E N T S

First- *Pelargonium cotyledonis* Rudy Lime

Second- *Sarcaulon* sp. Kenny Graham

Second- *Uncarina roeslii* Alan Wiess

Third- *Kedrostis africana* Carol Jean Wolcott

Third- *Euphorbia millii* Cena Martin

CALENDAR OF UPCOMING EVENTS

APRIL

— 2002 —

- 7-13 27th Congress of the International Organization for Succulent Plant Study (IOS) at the Desert Botanical Gardens, Phoenix, AZ. See IOS Web Page: www.iosweb.org or nempe@aol.com.
13-14 Season's First Cactus and Succulent Show and Sale, South Coast Cactus and Succulent Society. See Page 11, in this issue, for details!
14 SDCSS Field Trip to The Living Desert, see Presidents message, previous page for details!
26-27 Green Scane, Plant Sale at the Fullerton Arboretum, next to Cal State Fullerton.

MAY

- 18 SDCSS participates in Buds n'Bloom, Balboa Park, call Pam at 619-589-1223 to help with this event!
18-19 Gates Cactus and Succulent Society, 27th Show and Sale. Call 909 (?) 360-8802 or Write to Buck Hemenway, at BuckHen@earthlink.net.

JUNE

- 1-2 SDCSS Spring Show and Sale. **START PLANNING FOR THOSE AWARD WINNERS, IT IS NEVER TOO SOON!**
7-9 Mid-West Regional Conference, Kansas City, MO. Details: Eva Allen 816-444-9321 or e-mail: emallen@earthlink.net Check out their web page at <http://ourworld-top.cs.com/kccss1809>
8-9 C&SS of Queensland Show and Sale Mt.Cootha Botanic Gardens. Details from club, e-mail : cssq@powerup.com.au or check out their web page at <http://www.powerup.com.au/~cssq>

JULY

- 6-7 CSSA Show and Sale at The Huntington Botanical Gardens.
26-28 Pacific Northwest Regional Conference, in downtown Seattle, hosted by the Cascade CSS.
Info: Eugene Collias, 206-633-5570 or e-mail him at eugeneec@aol.com

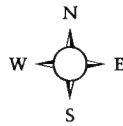
FYI FOR YOUR INFORMATION FYI

- ⇒ On a sad note, **Derith Hughes**, passed away early in the morning on Feb.27, 2002. She has been a club member for a number of years, and though she did not attend every meeting, when she did, she enjoyed herself. Derith was not a great cactus enthusiast, but liked many of the other succulents and enjoyed growing them. Her favorite was an *Adenium obesum* that she had in her office that bloomed for her. Her congenial personality will be missed, she was born Jan.23, 1940. This note is from, Susan Hopkins. Susan please accept our sincere condolences and relay them to her family.
- ⇒ It is that time of year, time to check out one of the most desert, deserts in the US, the **Anza-Borrego desert**. There are all sorts of events this month into the summer. Call the Desert Nature Center at 760-767-3098 or look at the Anza-Borrego Natural History Associations web site: www.abdnha.org. From the History of Gold Mining in the Cuyamacas to Desert Hikes, talks and Classes. Call for more info and take a look in our famous desert!
- ⇒ Quail Events, **Quail Botanical Gardens** is hosting several events coming up, the closest to home for us is the Succulent Wreath Class, May 8, 2002 from 10:00 AM to 2:00 PM. Why not start this holiday gifts now and have them looking great by the time Winter arrives! Registration and pre-payment required, enroll now! Call 760-436-3036 x203 to secure a place. Look at: www.qbggardens.com/qbgframed.html for a calendar of events.
- ⇒ **Baja Garden** opportunities. There are some great things happening in the Baja and Old World Gardens at the Wild Animal park and your assistance is requested. There is a plant survey going on in the Baja Garden, if you can spare some time during the week, you could help with the survey. Call Joey at 760-738-5048 when you get this in April. The survey should be done by May of 2002. Also, to help out in the garden call Chris Miller at 619-258-9915 or c.miller@cox.net. The crew has never had the garden looking better, I should know, I've looked at 744 Baja plants so far!
- ⇒ It is almost show time ... **please fill out those show cards ahead of time** this year - thanks!
- ⇒ The Pentagon is trying to get an exemption for the **Endangered Species Act**. Please make your wished known by writing your Congressman, Senator or other representatives, we need our wildlife protected. See the article in Saturday March 30, 2002, front page or online at: http://www.uniontrib.com/news/uniontrib/sat/news/news_1n30pentagon.html



COME TO THE FIRST SPRING CACTUS AND SUCCULENT

– Show and Sale of 2002 –



Presented by the South Coast Cactus and Succulent Society
Saturday and Sunday, April 13 and 14, 9:00 AM to 4:00 PM
at the South Coast Botanical Gardens, 26300 Crenshaw Blvd. Palos Verdes Peninsula
SEE outstanding displays by selected growers ...
ASK experts questions on how to grow plants ...
BUY plants from the top growers ...
VOTE for the best displays !

Contact Dick Hulett 310-832-2262 / airobatic@aol.com OR Jim Hanna 562-920-3046 / aloecats1@aol.com.

a brief Overview of the Genus *Echinocereus*

by Mark Fryer

The genus *Echinocereus* has to be one of the most profoundly enchanting and simultaneously confounding genera of cacti on the planet. Having a physical distribution second only to the *Opuntias* and similar idiosyncrasies in geographic form, it's no wonder these cacti have been the subject of much debate and consternation amongst those of us with well-founded cacti addictions.

My addiction to these plants began well over a decade ago when a close friend of mine decided it was time to double his greenhouse size to accommodate his ever-expanding *Echinocereus* collection. When confronted with the insanity of what he was doing and the expenses involved, he simply replied he was going to build a world-class reference collection. Many passions in life are contagious, and such was the case with my exposure to the genus *Echinocereus*.

Right off, I had questions to which there seemed to be no clear answers. I was trying to formulate the question, "What is a 'type' plant, how would you describe the essence of what is an *Echinocereus*?" But the question just led to more questions that eventually led to an insatiable appetite for theory and conjecture.

Historically, we think the name is most likely owed to Dr. George Engelmann, who was the first to officially use the name in describing plants we now call *Echinocereus*. The discovery of the first plants are attributed to Thomas Coulter and described by Augustin de Candolle in 1828 as *Cereus pentalophus*, and *Cereus cinerascens* respectively. The 'type species' cited by Engelmann some 20 years later in 1848, is *Echinocereus viridiflorus*. Perhaps as a sign of things to come nomenclaturally, a year later he took the plant found by Wislizenus near Wolf Creek, New Mexico, and renamed it *Cereus viridiflorus*. It's not clear to me when, how, or if Engelmann ever reversed that decision, but eventually others did.

The genus has undergone incredible bouts of amplification and constriction since its inception. These days the consensus among *Echinocereus* addicts is that there are 45 quite distinct species with countless geographic forms, varieties, and garden mutants. In 1985 Nigel Taylor of Kew Gardens in the UK set about publishing a monograph on the genus. Supplementary notes to that monograph were published in 1988 and 1989, in Bradleya 6 and 7, respectively. This was followed by some additional changes in 1993 (published in the Italian journal *Piante Grasse*). Taylor's work yielded an interesting system of breaking the genus into 7 sections, based on types of forms, including the former genera *Morangaya* and *Wilcoxia*, in *Echinocereus*. Another more recently discovered species (*Echinocereus mapimiensis*) was described by Anderson in 1998. It seems likely that there may be other good species yet to be discovered which may continue to change the way we view the genus.

So where does it all fit? A good question. The theory of cacti evolution has proven to be elusive to possess without a decent fossil record, but there are some very astute observers who've noted some interesting correlations between genera.

Subsuming *Morangaya* into *Echinocereus* as a basal (primitive)

section has proved interesting in concept, as well as intriguing to the avid *Echinocereus* gardener. I have yet to find a species of *Echinocereus* in the strict sense that won't pollinate its flowers and produce seed (which produce weird and mutant offspring). It doesn't take the imagination of Walt Disney to see the correlation to other floppy-stemmed species, or the other almost zygomorphic flowering species (think *E. polyacanthus*, *E. triglochidiatus*, etc.).



Echinocereus scheeri



Echinocereus lindsayi



Echinocereus viridiflorus

vigilant and observant as possible.

On the plus side, the genus encompasses an incredible diversity of forms in stems, spines and flowers. Having some of the largest and most long-lasting flowers of the cactus family, species of this genus can be richly rewarding. Consider the overall form of stem and spine and the plants have something to offer the year round, even when not in flower. From the comb-like spination of *E. pectinatus*, to the robust red spines of *E. lindsayi*, to the delicately hairy *E. delaetii*, the range of spine form within this group is daunting. Probably the genus *Mammillaria* would come closest in competing with the range of spination found in *Echinocereus*.

Here in southern California, I doubt there are many species of this genus which cannot be grown in the out-of-doors with good results. While our winter rains (when they occur) might push the envelope for a number of the more finicky species, the majority I've transplanted here have been quite happy in the ground. I've also had the pleasure of seeing a number of member's gardens who have some well-established *Echinocereus* plantings, confirming how well these plants can fit into our coastal desert-scrub environment. I'm surprised that folks don't have more of these plants integrated in their gardens.

Our library has some excellent resources for learning more about these plants I'd recommend the following titles:

- Frank, Gerhard R.W., Ohr, Martina and Andreas, Romer, Richard (2001), *Die Echinocereen der Baja California*.
- Taylor, Nigel P. (1985), *The Genus Echinocereus*.
- Taylor, Nigel P. (1988), *Supplementary notes on Mexican Echinocereus* (1) in Bradleya 6.
- Taylor, Nigel P. (1989), *Supplementary notes on Mexican Echinocereus* (2) in Bradleya 7.
- Taylor, Nigel P. (1993), *Ulteriori studi su Echinocereus* in Supplemento Piante Grasse 13.

And for those who have internet access, Martina and Andreas Ohr have a wonderful website dedicated to these plants at: <http://www.echinocereus.de>. Which includes Terry L. Corbett's massive Echinocereus Index, and links to other resources specific to these plants.

To summarize an overview of even a small section of the taxonomy of *Echinocereus* would be a book in and of itself, and so I have provided some recommended reading at the end of this little article.

In culture, the Echinocerei can be as challenging as they are rewarding. This is not your Mother's *Notocactus*! There are few plants I've ever found myself cursing at, but this group can certainly be well deserving of the occasional demonic diatribe. On the down side they can act like pest magnets and suddenly fall over dead, seemingly without warning. Echinocerei are unfortunately prone to a number of fungal diseases, including *Helminthosporium cactivorum*, a fungal infection that can overtake and kill a plant in what seems like a matter of minutes. Rather high maintenance in pots, frequent repotting becomes a necessity to avoid problems of dry-rot or dehydration. With flabby stems and an epidermis rich in sucrose, nasty denizens like spider-mites and scale find them irresistible. I personally do my best to treat with systemic insecticide/fungicide annually, and remain as



Justin Fryer - Like father, like son. Ask me no cactus classification questions and I'll tell you no lies.

Pelargoniums

by Michelle Heckathorn

Pelargonium is a genus composed of hundreds of species and thousands of cultivars. Most representatives are found in Africa from Namaqualand to the southern edge of South Africa, with some of the species occurring in Australia, the Mediterranean, the Mid-East, and India. Among their members are some of the easiest to grow, being free flowering and forgiving of some neglect, making them popular with first time gardeners. Some of the species have an added bonus, not only being ornamental, but are sources of food, medicines, perfumes, and dyes used in makeup and clothing.



Pelargonium klinghardtense

Care is relatively simple if you can keep track of the ones that have a period of dormancy. Most of the species prefer full sun, but those that grow under shrubs and grasses will take a little shade. All types want a well-drained soil, especially the succulent and geophytic types. These prefer a mix with a higher percentage of sand; at least a 2:1 mix. All like moisture, but be warned, not all Pelargoniums are alike. Geophytes and succulents want to be watered during active growth and flowering only, to water during dormant periods could result in the loss of the plant.

What could be more fun than buying a new geranium? Growing it yourself, of course and having the satisfaction that you raised that plant from the beginning. Most of the species that we grow are propagated in two primary ways: cuttings or seed. The majority of the geophytic and succulent types do not produce offsets. Cuttings are by far the easiest way to propagate geraniums and produce plants true to type from the hybrids and some cultivars. The best time to cut is from spring to fall when the plants are in their most active growth. Choose a stem with tight internode spacing and at least three nodes. Remove all flowers and all leaves from the bottom two nodes. Then place the cutting into a sterile potting mix, making sure that two of the nodes are below the soil surface. Keep the soil moist, and if some cuttings are stubborn, bottom heat helps accelerate the process. If you do not have access to bottom heat, try using Styrofoam cups instead of plastic pots. I'm not sure why it works, but it does.

Seed is the only way to reproduce many of the species and the only way to create new hybrids and cultivars. *Pelargonium* seed stays viable for up to seven years, but germination rates are better if sown as soon as it is harvested. I have the best success when I immediately sow the seed after collection either in the same pot as the parent or in a sterile mix with soil and perlite 1:1. I keep the soil moist, and to prevent damping-off disease, I use an organic method: chamomile tea. It is a natural antibiotic and fungicide. You can make this up to two days in advance, using five single serve tea bags per gallon of water. Germination can be erratic, occurring anywhere from two days to five years, so don't give up too soon!

Being lovers of the cacti and succulents, we want the most unusual members of the genus for our collections. These fall into two groups: the stem succulents and the geophytes.

The stem succulents include the following:

From South Africa, Namaqualand, and Namibia

Pelargonium crithmifolium (sapphire-leaved)

Pelargonium carnosum (succulent)

Pelargonium tetragonum (four-angled)
Pelargonium crassicaule (thick stem)
Pelargonium alternans (alternately placed leaves)
Pelargonium laxum

This also includes the singular resident of St. Helena, an island off the coast of western Africa, *Pelargonium cotyledonis*. This is also the only *Pelargonium* with pure white flowers.

The geophytic species include these:
 From South Africa;

Pelargonium oblongatum (oblong tuber)
Pelargonium triste (dull color reefing to the flowers)

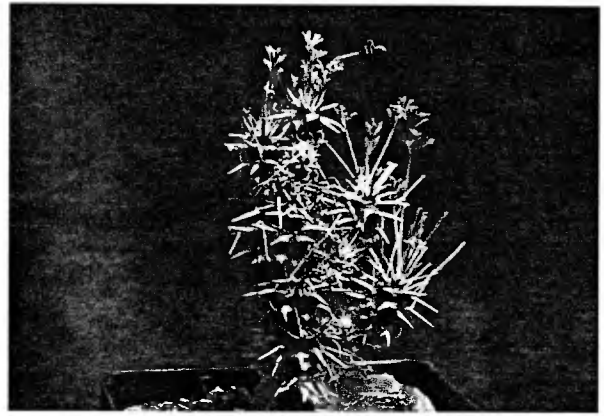
Pelargonium schizopetalum (refers to the divided petals)

Pelargonium rapaceum (turnip-shaped tuber). The Hottentots use this one as a food source. They roast it in hot ashes, and use it as an antibiotic and to stop diarrhea.

Pelargonium caffrum (has neat feathered petals, named after its location)

Pelargonium reniforme (kidney-shaped) and *Pelargonium sidiodes*. These two are so closely related that the latter used to be considered a variety of the former.

Pelargonium aridum (dry or arid)



Pelargonium hirstii



Pelargonium alternans Photo by Matija Strlic

One of the few species from Australia is *Pelargonium rodneyanum*. This species flowers pink.

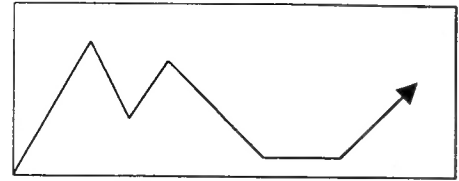
There are many more species that would fit these two groupings that I did not mention, but I chose ones that were interesting or more familiar to me.

Bibliography

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- Van der Walt, J.J.A. *Pelargoniums of Southern Africa*: Cape Town, Africa; 1977
- Van der Walt, J.J.A. and Vorster, P.J. *The Pelargoniums of Southern Africa Vol. 2*: Cape Town, Africa; 1981.
- Van der Walt, J.J.A. and Vorster, P.J. *The Pelargoniums of Southern Africa Vol. 3*: Cape Town, Africa; 1988
- Webb, William J. *The Pelargonium Family*: London, Great Britain; 1984

WHATS THE STATUS?

by J. L. HUDSON, SEEDSMAN, STAR ROUTE 2,
BOX 337, LA HONDA, CALIFORNIA 94020 USA



TOPIC #20: USDA Plans Severe Gardening Restrictions

Your help is needed! The USDA is now accepting public comments on their Draft Action Plan for the Noxious Weeds Program, which includes the "clean list" or "white list" proposal. They are now going beyond the clean list and are stating that they intend to require permits and inspections for **ALL seeds and plants moving interstate** – this will effectively shut down many popular seed exchanges like the North American Rock Garden Society exchange and the Seed Saver's Exchange. These exchanges have been hailed as important means of preserving biodiversity. How many home seed savers will be willing to get appropriate licenses and inspections when they cost a minimum of \$100 (for a nursery stock or seed license here in California). Penalties of up to \$250,000 are proposed with a minimum fine of \$1000 even for home gardeners.

Please link to this page: <http://www.jlHUDSONseeds.net/USDAComment.htm>

To read the proposal for yourselves go to: <http://www.invasivespecies.gov/council/actionb.shtml>

Contact Alan.V.Tasker@usda.gov and state you are opposed to the "clean list" and any permit or inspection requirements for interstate movement of seeds and plants. State that the Draft Action Plan for the Noxious Weeds Program is unacceptable must be halted, additional time for public comment allowed, and no new restrictions on the free flow of any seeds and plants that are not listed noxious weeds be put in place.

Write to your representatives and demand that the out-of-control USDA be reined in. These proposals fundamentally change the regulations on the importation and distribution of plants. Currently, you may import, possess and distribute all plants except a few known harmful species that are banned – a "blacklist" approach in which everything is permitted except what is prohibited. The new Clean List (or white list) policy is the opposite – everything is prohibited except what is on a government-approved "clean list" of species that the USDA permits. This will effectively ban 99% of the species on the planet. The clean list or white list has been called an internet hoax, and the agencies involved have actually sent out letters denying they have such plans – go to their website and read for yourself what they say:

<http://www.aphis.usda.gov/ppq/weeds/> See Weed Action Plan - 4th blue box down on the right.

Contact Your Members of Congress in
Washington, DC

Secretary of Agriculture
Ann Veneman
Jamie L. Whitten Federal Bldg. Rm. 200-A
12th & Jefferson Dr., SW
Washington DC 20250
Phone 202-720-3631, Fax: 720-2166
Email: agsec@usda.gov

Send the sample letter to an elected
representative. E-mailing is second-best, as a

physical letter carries much more weight. Send a copy to the USDA, marked "My comments on the Draft Action Plan for the Noxious Weeds Program". Also be sure to send 4 copies of your comments to:

Docket No. 01-034-1
Regulatory Analysis and Development PPD, APHIS
Suite 3C03 4700 River Road, Unit 118
Riverdale, MD 20737-1238

This is necessary so that your e-mails will not simply be deleted.

... bringing this issue to our attention. The following is a sample letter.

Honorable _____

As a concerned voter, I am writing object to the USDA Draft Action Plan for the Noxious Weeds Program, which will implement a "clean list" and other unwarranted restrictions controlling the import and movement of plants and animals in the U.S., allegedly to stop the spread of "invasive species." I feel that this "clean list" would be a reckless and irresponsible policy, for the following reasons:

1. Such a policy requires adequate, scientifically verified methods of predicting which species would be "invasive," yet all scientific attempts at predicting "invasiveness" have failed.

2. We already have adequate weed laws. We already know which species are pests; implementing a sweeping, poorly-conceived ban on what will amount to 99% of the world's species will cause more problems than it could possibly solve.

3. Scientific researchers need ready access to the earth's biological resources for new food crops, new medicinal plants, new industrial uses. Limiting this access will place U.S. scientists at a disadvantage in the competitive world markets. Limiting our farmers' access to new crops will increase our dependence on foreign supplies.

4. It will result in greater usage of herbicides on our public lands.

5. It will do nothing to address the fundamental causes of "invasive" species - disrupted ecosystems.

6. Small entrepreneurial businesses are responsible for the majority of all jobs created in the past 20 years, and they will bear the brunt of the economic harm this measure will create. Small nurseries have been responsible for the majority of new plant introductions from overseas which have revitalized the entire gardening industry in recent decades.

7. According to the USDA Economic Research Service, horticulture and floriculture are the fastest growing sector of U.S. agriculture with 12.1 billion in revenues in 1998, and this has steadily risen since. In these difficult economic times, it is grossly irresponsible of the USDA to obstruct such an economic powerhouse with completely untested, unproven and unnecessary regulatory restrictions.

8. These restrictions may be illegal under free trade treaties, and are sure to invite retaliatory measures by our trading partners. This comes at a time when entrepreneurial free trade should be encouraged.

9. The clean list is only the latest in a pattern of USDA obstruction of legitimate business and biodiversity conservation efforts, as witness the recent imposition of outdated regulations that haven't been enforced in decades due to their inapplicability. The phytosanitary-certificate requirement for flower seeds which has been unnecessary and unenforced for over 50 years, and irrational prohibitions of modern sterile-culture orchid seedlings (essential for orchid conservation), have both been suddenly enforced by an out-of-control USDA, sending shockwaves throughout the nursery industry and gardening community. Antiquated, outmoded regulations from the 19th century should not be enforced in the 21st.

10. The clean list proposal is a reckless & irresponsible expansion of an antiquated, cumbersome and inefficient bureaucracy at a time when government should be moving towards a streamlined and efficient future.

11. When the USDA requested comments on the clean list proposal, American scientists, businessmen and gardeners were 8 to 1 against the clean list, yet the USDA ignored the clear mandate from the American people, and included this and even more restrictive proposals in the Draft Action Plan. The USDA is totally out of touch with the American people

I'm totally opposed to any "clean list" policy as well as the new phytosanitary and orchid-seedling restrictions, and I'm opposed to any further restrictions and roadblocks to interstate commerce. The USDA must get back to its mission of serving agriculture, not obstructing it.

In closing, I want to point out that gardeners are the single largest common-interest group in the U.S., and that you can be sure we will Remember In November. I will be waiting for your response, indicating what you are doing to rein in the USDA & NISC, and where you stand on the "clean list" issue.

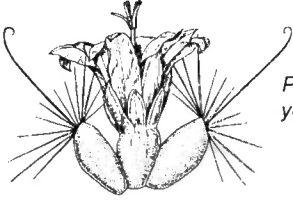
Sincerely,

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